## Michael Faillace & Associates, P.C.

60 East 42nd Street Suite 2020 New York, NY 10165

Ph:(212) 317-1200

Fax:(212) 317-1620

Damian Luna

August 7, 2015

**LAWYER** 

File #: Bocca
Attention: Inv #: Sample

RE: Luna et al v. Della Nona Corp. et al CIVIL DOCKET FOR CASE #: 1:14-cv-03872-LGS

DATE DESCRIPTION HOURS AMOUNT

Apr-25-14 Meeting with clients/ retainers and Intake 3.40 1.530.00

Apr-25-14	Meeting with clients/ retainers and Intake	3.40	1,530.00	MF
Apr-30-14	Meeting with clients/ intake- retainers	2.50	1,125.00	MF
May-01-14	Meeting with clients/ intake- retainers	3.10	1,395.00	MF
May-02-14	Meeting with clients/ intake- retainers	1.80	810.00	MF
May-07-14	Meeting with clients/intake- retainers	2.20	990.00	MF
May-15-14	Meeting with clients/ Intake- retainers	1.60	720.00	MF
May-19-14	Research- Searched the Corporation & Business Entity Database	1.80	810.00	MF
May-20-14	Drafted complaint	4.80	2,160.00	MF
May-22-14	Reviewed/ revised complaint	1.60	720.00	MF
May-23-14	Meeting with clients- reviewed the facts on the complaint.	4.50	2,025.00	MF
May-26-14	Reviewed Draft Complaint	1.50	562.50	SC
May-27-14	Review documents provided by clients	1.50	675.00	MF

May-29-14	Telephone call to clients- revised last draft of the complaint.	2.50	1,125.00	MF
May-30-14	Finalized and filed complaint- SDNY.	2.10	945.00	MF
Jun-11-14	Meeting with client / retainer and intake	0.90	405.00	MF
Jun-19-14	Meeting with client / intake- retainers	1.50	675.00	MF
Jul-24-14	Receipt and review of d's answer to the complaint.	0.50	225.00	MF
Jul-30-14	Preparation re IC	2.00	750.00	SC
Jul-31-14	Drafted Request to Adjourn; conferred with Opposing counsel; Filing	1.00	375.00	SC
Aug-25-14	Drafted Damages Calculation	2.00	750.00	SC
Aug-26-14	Drafted Proposed Pre-Conference, Proposed Scheduling Order, and Damages Calculation	1.00	375.00	SC
Sep-02-14	Conference with Court, travel	2.00	750.00	SC
Sep-05-14	review case management order, calendar events	0.10	40.00	JA
Sep-09-14	Receipt and review of CIVIL CASE MANAGEMENT PLAN AND SCHEDULING ORDER	0.25	112.50	MF
Sep-10-14	Meeting with clients- case status/ updates	1.50	675.00	MF
Sep-22-14	Prepared and served first sets of interrogatories and document demands	2.00	750.00	SC
Oct-31-14	Finalized Status Report and request re magistrate	1.00	375.00	SC
	Contacted Contacted D re sett conference	0.15	56.25	SC
Nov-11-14	Prepared letter re telephonic appearance request	0.50	187.50	SC
Nov-17-14	Prepared settlement conference letter re Peck Conference	2.00	750.00	SC

Nov-18-14	Meeting with clients- prepared for settlement conference.	1.50	675.00	MF
Nov-19-14	Meeting with client intake/retainers/ consent forms	3.20	1,440.00	MF
	Prepped and attended the mediation conference	3.50	1,575.00	MF
Dec-16-14	Meeting with office re case status, discovery	3.00	1,125.00	SC
Jan-16-15	Meeting with client intake/retainers/ consent forms	0.75	337.50	MF
	Meeting with Office re case status, filing of consents, review of consents and new parties	3.00	1,125.00	SC
Jan-30-15	Reviewed case status, new consents and new plaintiffs, disclosures	2.00	750.00	SC
Feb-09-15	Meeting with client intake/retainers/ consent forms	0.50	225.00	MF
Feb-23-15	Preparation of discovery extension request; confer with D Counsel	1.00	375.00	SC
Mar-02-15	Meeting with client intake/retainers/ consent forms	2.40	1,080.00	MF
Mar-04-15	Preparation re Depositions	3.00	1,125.00	SC
Mar-05-15	Attended and assisted Shawn at the depositions.	6.00	1,500.00	JS
	Attendance at P and D Depositions; Prep	6.00	2,250.00	SC
Mar-06-15	Preparation re Settlement Conference	2.00	750.00	SC
Mar-09-15	Reviewed Records & D Damages Calculation; conferred re any outstanding records	4.00	1,500.00	SC
	Conference re Settlement; travel, prep	4.00	1,500.00	SC
Mar-10-15	Called clients to schedule meeting time to review Defendants document production.	0.50	125.00	JS
Mar-11-15	Reviewed Defendant's discovery production - checked time cards and net payroll stubs for	2.50	625.00	JS

	both delivery and non-delivery workers, make notes of discrepancies to review with clients.			
	Called clients to schedule meeting time to review Defendants document production	0.50	150.00	JS
Mar-12-15	Called clients to schedule meeting time to review Defendants document production	0.35	87.50	JS
Mar-17-15	Called clients to schedule meeting time to review Defendants document production	0.25	62.50	JS
Mar-18-15	Meeting with Andres Reyes, Carlos Galeno, Juan Garcia, Andres Javier Flores, Antonio Mendoza, Jared Larios, Jose Amaro, Sixto Leal, Miguel Mendoza, Jose Romero, Juan Tapia and Juan Carlos Hernandez to reiview defendant's discovery production.	5.50	1,375.00	JS
Mar-19-15	Meeting with Mercedes Martinez, and again with Carlos Galeno and Juan Garcia to review documents provided by defendants and discuss the status of the case.	1.50	375.00	JS
Mar-20-15	Meeting with clients - Liberio Luis, Pedro Ramirez, Jorge Rolando Tenesaca, Arturo Molina Lopez and Rene Morales to review defendant's discovery productions.	4.50	1,125.00	JS
Mar-23-15	Reviewed Additional D Records re 2010	3.00	1,125.00	SC
Mar-24-15	Receipt and review of court's SCHEDULING ORDER	0.25	112.50	MF
	Conference Case Management Conference court appearance	1.50	562.50	RG
May-27-15	Contacted parties re mediation	0.15	56.25	SC
Jun-02-15	Drafted Status Report	0.15	56.25	SC
Jun-24-15	Drafted Status Report	0.50	187.50	SC
Jul-03-15	Prepared preliminary pretrial materials	3.00	1,125.00	SC
Jul-06-15	Prepared clients for mediation	4.50	2,025.00	MF
Jul-07-15	Prepared clients for mediation, discussed with clients their damages chart.	6.50	2,925.00	MF

	Preparation re Settlement Conference	3.00	1,125.00	SC
Jul-08-15	Attendance at Mediation with our clients- MF office	8.50	3,825.00	MF
	Attended the mediation conference	6.00	1,800.00	JS
	Reviewed Chart & Status Meeting	1.00	375.00	SC
	Settlement Conference; Preparation re Settlement Conference	7.00	2,625.00	SC
Jul-09-15	Contacted D re Settlement Confirmation	0.15	56.25	SC
Jul-13-15	Finalized Notice of Settlement; confer with D counsel	0.50	187.50	SC
Jul-23-15	Prepared Draft Settlement Agreement	2.00	750.00	SC
Jul-29-15	Review of Individual Settlement Percentages	1.00	375.00	SC
Jul-30-15	Finalized Draft Settlement Agreement; communicate to D Counsel	1.00	375.00	SC
	Totals	164.45	\$63,770.00	
DISBURSEMENTS				
Jun-03-14	Filing Fee Process Server Process Server		350.00 75.00 75.00	
	Process Server		75.00	
	Process Server		75.00	
	Totals	-	\$650.00	
	Total Fee & Disbursements		•	\$64,420.00
	Balance Now Due		-	\$64,420.00

TAX ID Number 20-1211098